

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.,	::	
Plaintiffs,	::	CIVIL ACTION NO.
	::	1:17-CV-2989-AT
v.	::	
	::	
BRAD RAFFENSPERGER, et al.,	::	
Defendants.	::	

**OBJECTION OF NON-PARTY AGNES BRIDGES, FAYETTE COUNTY
ACTING ELECTIONS SUPERVISOR, TO SUBPOENA TO PRODUCE
DOCUMENTS FROM COALITION FOR GOOD GOVERNANCE**

COMES NOW AGNES BRIDGES, in her official capacity as the acting elections supervisor for the Fayette County Board of Elections and Voter Registration, by and through the undersigned counsel, and makes this her objection to Plaintiff Coalition for Good Governance’s Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, dated January 8, 2021.

1.

On January 8, 2021, Non-party Agnes Bridges (hereinafter “Bridges”) was served with a Subpoena to Produce Documents. The subpoena requests production of 15 enumerated categories of documents. The subpoena commands production of the documents no later than January 22, 2021.

2.

To the extent that responsive documents exist, Non-party Bridges intends to comply with the requests set forth in the subpoena except as otherwise noted hereinafter.

3.

Non-party Bridges objects to Items 5, 8 and 14 of the subpoena which seek production of the following:

5. Electronic copies of all scanned ballot images appended with the Auditmark record showing the interpretation of each vote where applicable, for the January 5, 2021 election, and for both the election day count and the machine recount of the November 3, 2020 election.

8. High quality scans of at least 300 dpi for all ballots in the batches identified above in item (7).

14. Ballot images for all ballots (BMD and hand marked) in the January 5, 2021 election that do not list two U.S. Senate races and one Public Service Commission race.

The disclosure of ballot images violates the voting protections afforded by the Georgia Constitution which provides that votes are cast by secret ballot. 1983 Ga. Const. Art. II, Sec. I, Para. I. Additionally, pursuant to O.C.G.A. § 21-2-

500(a) such documents are statutorily held under seal for a period of 24 months, subject to release only upon order of a superior court.

4.

As to Items 1, 2, 3, 4, 12 and 15, Non-party Bridges has no responsive documents.

Respectfully submitted this 22nd day of January, 2021.

McNALLY, FOX, GRANT &
DAVENPORT, P.C.

BY: /s/ PATRICK A. STOUGH
PATRICK A. STOUGH
Georgia Bar No. 109811
Attorney for Non-party Agnes Bridges

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CERTIFICATE OF COMPLIANCE

I certify that the document to which this certificate is attached is double-spaced in 14-point Times New Roman font and complies with the type-volume limitation set forth in Local Rule 7.1.

This 22nd day of January, 2021.

McNALLY, FOX, GRANT &
DAVENPORT, P.C.

BY: /s/ PATRICK A. STOUGH
PATRICK A. STOUGH
Georgia Bar No. 109811
Attorney for Non-party Agnes Bridges

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CERTIFICATE OF SERVICE

I certify that I electronically filed the within and foregoing with the Clerk of Court using the CM/ECF system. I further certify that I have served a copy of the foregoing via U.S. Mail, postage prepaid, upon:

Bruce Brown, Esq.
1123 Zonlite Rd.
Atlanta, Georgia 30306

This 22nd day of January 2021.

McNALLY, FOX, GRANT &
DAVENPORT, P.C.

BY: /s/ PATRICK A. STOUGH
PATRICK A. STOUGH
Georgia Bar No. 109811
Attorney for Non-party Agnes Bridges

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